

## STATEMENT OF BASIS (AI No. 1945)

For the draft Louisiana Pollutant Discharge Elimination System permit No. LA0007862 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Tennessee Gas Pipeline Company  
Tennessee Gas Pipeline - Compressor Station 47  
200 Worthey Road  
West Monroe, Louisiana 71291

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

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**DATE PREPARED:** April 5, 2008

### 1. PERMIT STATUS

#### A. Reason For Permit Action:

Proposed reissuance of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit for a five year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46\*. Upon the effective date, this permit shall replace the previously effective Louisiana Water Discharge Permit System (LWDPS) permit WP0221 and National Pollutant Discharge Elimination System (NPDES) permit LA0007862.

- \* In order to ease the transition from NPDES to LPDES permits, dual regulatory references are provided where applicable. The LAC references are the legal references while the 40 CFR references are presented for informational purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903 and will not have dual references. In addition, state standards (LAC 33:IX.Chapter 11) will not have dual references.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

B. NPDES permit - NPDES permit effective date: November 4, 1979  
NPDES permit expiration date: November 3, 1984

\* EPA has not retained enforcement authority\*

Based on a memo dated December 23, 1985, the application for renewal was received December 18, 1985 after the expiration date. A letter from EPA dated March 6, 1986 stated the application had been reviewed and determined to be administratively complete. Therefore, the permittee remains covered until a final decision is made on their renewal application.

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C. LWDPS permit - LWDPS permit effective date: March 20, 1993  
LWDPS permit expiration date: March 19, 1998

The LWDPS permit expired on March 19, 1998 and the application for renewal was received September 17, 1997; therefore, the permit was administratively continued. An application addendum was received on April 6, 2004 and additional information was received via e-mail on March 28, 2008.

D. LPDES permit - LPDES permit effective date: N/A  
LPDES permit expiration date: N/A

## II. FACILITY INFORMATION

A. Location – 200 Worthey Road in West Monroe, Louisiana

B. Applicant Activity –

According to the application, the facility transports natural gas in interstate commerce. Compressor stations are strategically placed along the pipeline for the purpose of maintaining line pressure and flow rates and used as maintenance facilities for the line. Products are not manufactured at these stations. These stations function as service centers for the transmission of natural gas.

Sanitary wastewaters are discharged to a Publicly Owned Treatment Works (POTW).

Discharges are permitted under WP0221 and LA0007862, both of which are administratively continued.

In 2002, Compressor Building "A" was completely dismantled which eliminated the discharge of stormwater from roof drains to the surface of the ground. This also eliminated the discharge of process wastewater from the basement floor drains to the stations oil/water separator.

The wastewater generated during the replacement of scrubber filters and cleaning of the filter housing units at the station will hauled off-site for disposal.

### B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 4922

C. LOCATION – 200 Worthey Street, West Monroe, Ouachita Parish (Latitude 32° 33' 20", Longitude 92° 10' 57")

D. Facility Effluent Flow – 162,999 GPD.

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### III. RECEIVING WATERS

STREAM – an unnamed ditch, into D'Arbonne Hills Lake, thence to Tupawek Bayou, and thence to the Ouachita River

BASIN AND SEGMENT – Ouachita River Basin, Segment 080101

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply

The waterbody which is used as a drinking water supply source in Subsegment No. 080101 is LAC 33:IX.1111, "designated uses of drinking water supply, oyster propagation and/or outstanding natural resource waters apply only to the waterbodies specifically named in Table 3 (LAC 33:IX.1123) and not to any tributaries and distributaries to such waterbodies which are typically contained in separate subsegments".

### IV. OUTFALL INFORMATION

#### Outfall 001

- A. Discharge Type: Intermittent discharge of stormwater runoff combined with equipment washwater and effluent from Internal Outfall 101 (stormwater, building floor drainage, condensed water from the air compressor system, and equipment washwater).
- B. Treatment: none
- C. Location: at the point of discharge from the eastern side of the facility prior to combining with other waters (Latitude 32° 33' 19", Longitude 92° 10' 41")
- D. Flow: Intermittent
- E. Receiving Waters: an unnamed ditch into D' Arbonne Hills Lake, thence to Tupawek Bayou, and thence to the Ouachita River
- F. Basin and Segment: Ouachita River Basin, Segment No. 080101

#### Outfall 101

- A. Discharge Type: Intermittent discharge of stormwater runoff combined with building floor drainage, condensed water from the air compressor system, and equipment washwater.
- B. Treatment: oil and water separation and rock reed filter
- C. Location: at the point of discharge from the rock reed filter system into a holding tank where it is sampled and analyzed thence into a retention pond prior to combining with outfall 001 at (Latitude 32° 33' 8.5", Longitude 92° 10' 49")
- D. Flow: Intermittent

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E. Receiving Waters: the on-site retention pond

F. Basin and Segment: Calcasieu River Basin, Segment No. 080101

## V. PROPOSED CHANGES FROM PREVIOUS PERMIT

The NPDES permit LA0007862, effective November 4, 1979, includes flow, oil and grease (10 mg/L daily average and 15 mg/L daily max); and temperature (100°F) as effluent limitations. However, due to the significant changes in the facility operations, the Department finds the LWDPs permit effluent limitations more applicable for this permit. Therefore, temperature and oil & grease (daily average of 10 mg/L) effluent limits have been removed from this permit.

Summary of proposed permitting changes from the administratively continued LWDPs permit:

- A. Outfall 101 has been relocated to a point adjacent to the 96,000 gallon wastewater holding tank and rock reed filter. A sample will be taken at this point and wastewater released from the holding tank if required parameters are within the permit limits. The water would migrate through an on-site ditch into an on-site pond and thence to outfall 001 where it would exit the facility.
- B. Visible Sheen requirement was deleted for stormwater runoff, equipment wash water, and cooling tower blowdown/boiler blowdown as per the General Rationale for Natural Gas Processing Plants and Compressor Stations.
- C. The proposed outfall 002 identified in the 1997 application consists of only storm water and per LAC33:IX.2511A.2.b is not required for coverage under this permit.

## VI. PERMIT LIMIT RATIONALE

The following sections set forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit.

- A. **Outfall 001-** Intermittent discharge of stormwater runoff combined with equipment washwater and effluent from Internal Outfall 101 (stormwater, building floor drainage, condensed water from the air compressor system, and equipment washwater)

Parameter	Monthly Average	Daily Maximum	Frequency	Sample Type
Flow	Report	Report	1/quarter	Estimate
TOC	---	50 mg/L	1/quarter	Grab
COD	---	125 mg/L	1/quarter	Grab
PCB's	---	No Discharge	1/quarter	Grab
Oil & Grease	---	15 mg/L	1/quarter	Grab
pH	6.0 min	9.0 max	1/quarter	Grab

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#### Site-Specific Consideration(s)

Flow – established in accordance with LAC 33:IX.2707.1.1.b. Flow shall be monitored continuously. These requirements have been retained from the administratively continued LWDPs permit, effective March 20, 1993.

TOC – effluent limitations are established in accordance with General Rationale for Natural Gas Processing Plants and Compressor Stations and consistent with the Multi-Sector General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements have been retained from the administratively continued LWDPs permit, effective March 20, 1993.

COD - effluent limitations are established in accordance with General Rationale for General Rationale for Natural Gas Processing Plants and Compressor Stations and consistent with the Light Commercial General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements have been retained from the administratively continued LWDPs permit, effective March 20, 1993.

PCB's - effluent limitations are established in accordance with General Rationale for the Light Commercial General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements have been retained from the administratively continued LWDPs permit, effective March 20, 1993.

The facility's Site Characterization Plan dated March 26, 1990 states the main mechanical component of Tennessee Gas compressor stations are natural gas compressor engines. These engines are used to increase pressure in the pipeline, which is lost due to friction. The compressed air used to start the engines is supplied by on-site air compressors. Previously, Tennessee Gas used "Pydraul", a synthetic lubricant later found to contain PCBs, in the compressors for many years. Although Tennessee Gas stopped purchasing Pydraul in 1974, residual concentrations of PCBs have been found in the compressor and associated piping systems, drainage system, and soils.

Oil and Grease - effluent limitations are established in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations and consistent with the Multi-Sector General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements have been retained from the administratively continued LWDPs permit, effective March 20, 1993.

pH - effluent limitations are established in accordance with LAC33:IX.1113.C.1. Ph shall be monitored 1/quarter. These requirements have been retained from the administratively continued LWDPs permit, effective March 20, 1993.

**Outfall 101** - stormwater runoff combined with building floor drainage, equipment washwater, and condensed water from the air compressor system

Parameter	Monthly Average	Daily Maximum	Frequency	Sample Type
Flow	Report	Report	1/quarter	Estimate
TOC	---	50 mg/L	1/quarter	Grab
Oil & Grease	---	15 mg/L	1/quarter	Grab

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#### Site-Specific Consideration(s)

Flow – established in accordance with LAC 33:IX.2707.I.1.b. Flow shall be monitored continuously. These requirements have been retained from the administratively continued LWDPs permit, effective March 20, 1993.

TOC – effluent limitations are established in accordance with General Rationale for Natural Gas Processing Plants and Compressor Stations and consistent with the Multi-Sector General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements have been retained from the administratively continued LWDPs permit, effective March 20, 1993.

Oil and Grease - effluent limitations are established in accordance with General Rationale for Natural Gas Processing Plants and Compressor Stations and consistent with the Multi-Sector General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements have been retained from the administratively continued LWDPs permit, effective March 20, 1993.

#### **VII. TMDL Waterbodies**

##### Outfalls 001 and 101

The discharges include stormwater runoff combined with equipment washwater and previously monitored effluent from Outfall 101 (stormwater, building floor drainage, condensed water from the air compressor system and equipment wash water) to an unnamed ditch, into D'Arbonne Hills Lake, thence to Tupawek Bayou, and thence to the Ouachita River

Subsegment 080101, D'Arbonne Hills Lake is listed on LDEQ's Final 2006 303(d) for color. However, based on an evaluation of the facility's discharge, it has been determined that there is no potential to discharge constituents that would contribute to this impairment. This facility is primarily discharging stormwater combined with equipment washwater, condensed water from air compressors, and building floor drainage. Therefore, no additional reporting requirements were placed on Outfalls 001 and 101.

Subsegment 080101 was previously listed as impaired for mercury, nutrients, organic enrichment/low DO, and phosphorus, for which TMDL's were developed for mercury on June 13, 2002, and organic enrichment/low DO, nutrients, and phosphorus on March 2, 2007. To date, the following TMDLs have been completed:

##### Mercury

The *Ouachita River TMDL Report for Mercury* was finalized on June 13, 2002. The TMDL report identified atmospheric deposition and nonpoint sources as the predominant sources of mercury with point sources representing less than 1 percent. Current TMDLs attribute no indication that mercury is discharged from a natural gas compressor station, therefore, mercury requirements will not be placed in this permit.

##### Nutrients/Phosphorus/Organic enrichment/low DO

The *Ouachita River TMDL Report for Biochemical Oxygen-Demanding Substances and Nutrients*, finalized March 2, 2007, addressed organic enrichment/low DO and nutrients. The TMDL evaluated the impact of nutrients on the Ouachita River dissolved oxygen and determined that the dissolved oxygen is not significantly impacted by increased nutrient discharges or increased nutrient levels and, therefore, concluded that no TMDL for nutrients was needed.

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving

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water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to be established. TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

## **VIII. COMPLIANCE HISTORY/COMMENTS**

### **A. Compliance History**

There are no open enforcement actions for Tennessee Gas Pipeline, Tennessee Gas Pipeline-Compressor Station 47.

### **B. Inspections**

A compliance evaluation inspection was conducted on August 3, 2007. The following items were noted:

Facility is considered a natural gas compressor station with two stormwater outfalls 001 and 101. Outfall 001 is located on the east side of the facility. Outfall 101 is located at the rock reed filter. Building process area floor water is routed to the skimmer then to the rock-reed filter. Most of the water evaporates and any excess is routed to an aboveground water tanks, sampled, then sent to a large 90,000 gallon water tanks to wait for disposal off-site. No discharge was noted at the time for inspection. Facility appeared to be well-maintained with all records and reports in compliance.

### **C. DMR Review/Excursions**

A review of the Discharge Monitoring Reports (DMRs) from January 2005 to December 2007 revealed no exceedances.

## **IX. "IT" QUESTIONS - APPLICANT'S RESPONSES**

This is a new minor facility. IT questions were not required to be addressed.

## **X. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 080101 of the Ouachita River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

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## **XI. HISTORIC SITES**

The discharge is from an existing facility. There should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## **XII. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to permit the discharges described in the application.

## **XIII. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List